

September 14, 2004

Mr. John Johnston
U.S. Environmental Protection Agency
Region 4
61 Forsyth Street SW
Atlanta, Georgia 30303

Reference: **Comments on RCRA Facility Assessment Report
Asheville Dyeing and Finishing Facility
850 Warren Wilson College Road
Swannanoa, North Carolina
NCD070619663
MSE Job# 123**

Dear Mr. Johnston:

Culligan International Company (Culligan) and Anvil Knitwear received the draft RCRA Facility Assessment Report (RFA) dated July 29, 2004 for the Asheville Dyeing and Finishing (AD&F) facility located in Swannanoa, North Carolina. The RFA was reviewed by representatives of both Culligan and Anvil Knitwear. Mineral Springs Environmental is submitting these comments for your consideration on behalf of Culligan and Anvil Knitwear.

EXECUTIVE SUMMARY

✓ **Paragraph 3** – *"The entire ADF property comprises approximately 54 acres and includes a 157,613 square foot building that includes office space, a large manufacturing area, a maintenance garage, two loading docks, and a Quality Control laboratory."*

The building is approximately 205,000 square feet in size and the overall acreage should be changed from 54 acres to 65 acres.

✓ **Paragraph 4** – *"The only historic unit remaining from Asheville Dyeing and Finishing is the groundwater remediation system that was put in place to treat a spill of perchloroethylene (PCE) that occurred prior to 1985."*

The groundwater remediation systems were installed between 1997 and 2001, subsequent to the Anvil Knitwear purchase. Therefore, the remediation systems were not part of the original Asheville Dyeing and Finishing process. Please delete this statement from the RFA document.

Paragraph 4 – "After the laboratory approves the fabric, the fabric is wrapped in plastic wrap and packaged to be shipped to customers in Honduras and El Salvador."

✓ Please delete the words "in Honduras and El Salvador". This wording is not relevant to the context of this report.

Paragraph 5 – "Based on the PR and information gathered during the BSI, a total of 23 SWMUs and two AOCs were identified at the ADF facility."

✓ This sentence states that two AOCs were identified at the subject facility. During review of the attached text and table, only one AOC was identified. Please change this sentence to indicate that one AOC was identified.

SECTION 2.1: File Search and Visual Site Inspection

Paragraph 3 – "The primary facility participants were Steve Pegg, Director of Human Resources for Anvil Knitwear, Bob Laboube, Culligan International, who is the consultant for Asheville Dyeing and Finishing, and Kirk Pollard, Mineral Springs Environmental, who is the previous consultant for Asheville Dyeing and Finishing."

✓ This sentence should read "The primary facility participants were Steve Pegg, Director of Human Resources for Anvil Knitwear, Bob Laboube, Culligan International, Project Manager for RCRA Remediation Activities for this site, and Kirk Pollard, Mineral Springs Environmental, current consultant for the AD&F facility."

SECTION 4.0: Description of Site Activities and History

✓ *Paragraph 2 - "The process equipment that was owned and operated by Asheville Dyeing and Finishing were reportedly removed when Anvil Knitwear purchased the property."*

Remove the word reportedly.

✓ *Paragraph 3 – "After the fabric is approved by the laboratory, the fabric is wrapped in plastic wrap and packaged to be shipped to customers in Honduras and El Salvador."*

Please remove the words "in Honduras and El Salvador". This wording is not relevant to the context of this report.

SECTION 4.2: Regulatory History

Paragraph 1 – "The PCE reportedly entered an eight-inch corrugated drain pipe (SWMU 14) located on the Winston Mills, Inc. property that ultimately discharged into Beetree Creek"

The reference in parenthesis should be changed from (SWMU 14) to (SWMU 13).

Paragraph 3 – "The site consists of an approximately one-acre area where construction and demolition debris, miscellaneous metal materials, tires and 55-gallon drums were dumped."

Please add the word "empty" before 55-gallon drums. Also remove the word dumped and add the word placed.

Paragraph 3 – "These wastes may include rocket fuel, munitions, warfare chemicals, and smoke bombs."

This sentence should be deleted from the document. There is no evidence that these materials were ever disposed of on the AD&F property.

Paragraph 8 – "In 1998-99, United States Filter Corporation became the owner/operator of the site."

This sentence should be deleted from the text. United States Filter Corporation never owned or operated the site.

SECTION 5.1: Site Location and Setting

Paragraph 1 – "The entire ADF property comprises approximately 54 acres and includes a 157,613 square foot building that includes office space, a large manufacturing area, a maintenance garage, two loading docks, and a Quality Control laboratory."

The property comprises approximately 65 acres and the building is approximately 205,000 square feet in size.

SECTION 5.1.2: Topography and Surface Water

Paragraph 1 – "The immediate area surrounding the facility is relatively flat and slopes east down gradient to Beetree Creek (SWMU 13)."

Reference is made that Beetree Creek is SWMU 13. This reference should be deleted from the document.

The following information should be added to this section:

- The portion of Beetree Creek which flows adjacent to the AD&F facility and emanates from the Beetree Reservoir is not a part of the drinking water supply for the city of Asheville.
- The Swannanoa River is also not a part of the City of Asheville drinking water supply.

SECTION 6.0: SWMU and AOC Descriptions

Paragraph 1 – "Based on the PR and information gathered during the VSI, a total of 23 SWMUs and two AOCs were identified at the ADF facility."

Please change the number of AOCs from two to one.

SECTION 6.7: SWMU 7 - Secondary Containment for Tote Farm

Paragraph – History and/or Evidence of Release(s)

The following discussion should be added to this section:

No visible signs of leakage were noted. In addition, no visible or historical leaks have been identified within the containment area. Should a release occur, the material would be contained at the point of release and/or enter a floor drain. From the drain, the material would flow to the central drainage feature located within the basement. It is unlikely a release inside the facility would impact the soil beneath the building.

Based on the information provided above, we request that the recommendation for this SWMU be changed from "Confirmatory Sampling" to "No Further Action".

SECTION 6.8: SWMU 8 - Secondary Containment in Dye Mixing Room

Paragraph – Recommendation

This SWMU is located on the second floor of the facility. Floor drains from this area lead to the central drain located in the basement. It is unlikely that a release at the dye mixing room would result in a release to the soil. Therefore, conducting piping integrity testing is not warranted, and the recommendation for this SWMU should be changed from "Confirmatory Sampling" to "No Further Action".

SECTION 6.9: SWMU 9 – Interior Floor Drains/Trench Drains

Paragraph – Recommendation

4 X Based on the expansive nature of the piping system, it is not practical to perform integrity testing along the entire run of interior floor pipes and trench drains. This testing would require significant plant down time and would provide little benefit. Should a breach in the piping occur, a reduced water flow would have been recognized at the wastewater plant. Such a reduction has not been observed. For more than 15 years, groundwater from numerous wells around the plant has been analyzed for the presence of potential constituents of concern. In that time, no additional compounds have been identified which would suggest that additional sources of groundwater impact are present beneath the building. Therefore, the recommendation for this SWMU should be changed from "Confirmatory Sampling" to "No Further Action".

SECTION 6.10: SWMU 10 – Former Waste PCE Tank Area

Paragraph – Physical Description and Condition

✓ "Located near the southeast corner of the facility building was an underground storage tank that was used to store spent TCE between 1971 and 1985. This tank, along with another UST used to store new TCE, was reportedly removed by the facility in 1985."

These sentences should be changed to reflect that one underground storage tank was used to store spent PCE and that the second tank was used to store virgin PCE. An additional reference to the tank being used for the storage of spent TCE is also included in the section below entitled "Wastes and/or Hazardous Constituents Managed".

SECTION 6.13: SWMU 13 – Eight-inch Drain

Paragraph – Wastes and/or Hazardous Constituents Managed:

✓ "The release entered into an eight-inch corrugated drain pipe (SWMU 14) located on the Winston Mills, Inc. property that ultimately discharged into Beetree Creek."

The drain pipe should be referenced as (SWMU-13).

SECTION 6.14: SWMU 14 – Old Dump Area

Paragraph – Physical Description and Condition

"The site consists of an approximately one-acre area where construction and demolition debris, miscellaneous metal materials, tires, and 55-gallon drums were dumped."

Please add the word "empty" before 55-gallon drums. Also remove the word dumped and add the word placed.

Paragraph – Wastes and/or Hazardous Constituents Managed:

"The state indicated that the results could be attributed to the waste reportedly buried in the dump area, including rocket fuel, munitions, warfare chemicals, and smoke bombs."

This sentence should be deleted from the document. There is no evidence to indicate that rocket fuel, munitions, warfare chemicals, and/or smoke bombs were disposed of in this SWMU.

Paragraph – Comments:

Please add the following discussion:

It cannot be confirmed using visual observations that hazardous waste or materials were ever placed in the dump area. Sampling activities conducted by the North Carolina Superfund Section ^{for} and others have not revealed significant soil or groundwater impact. In addition, the majority of the material within the dump area appears to consist of concrete blocks, old ductwork, and some empty drums.

Since the area is overgrown with vegetation, it is not practical to conduct extensive sampling or investigation within the landfill. As part of the October semi-annual groundwater monitoring event, the existing monitoring wells will be sampled to determine current groundwater conditions in this SWMU. These results will be forwarded to the North Carolina Hazardous Waste Section and will be used to evaluate the need for further assessment. This sampling should be used to determine if an RFI is warranted.

"The North Carolina groundwater standards for these priority pollutant metals are 0.005 mg/L for cadmium, 0.05 mg/L for chromium, 1.0 mg/L for copper, 0.015 mg/L for lead, 0.01 mg/L for nickel, and 2.1 mg/L for zinc."

The sentence should be changed to indicate that the groundwater standard for nickel is 0.1 mg/L.

SECTION 6.16: SWMU 16 – Former Drum Storage Area

Paragraph – Wastes and/or Hazardous Constituents Managed:

"The Former Drum Storage Area was used to temporarily store 55-gallon drums containing drill cuttings, development water and purge water generated during the installation of the facility's Sparging/SVE Remediation Systems (SWMU 11)."

✓ The 55-gallon drums were used to store drill cuttings, development water and purge water associated with the installation of monitoring wells MW-16s, MW-16d, MW-17s, MW-17d, and MW-18s, not wells installed as part of the remediation system.

SECTION 6.24: AOC 1 – Former Disturbed Soil Area

Paragraph – Comments:

✓ Monitoring wells have been installed to monitor the groundwater impact in this area. In addition, a groundwater remediation system has been installed to address the groundwater impact associated with this release. Based on the work previously completed, confirmation soil sampling is necessary to determine the lateral extent of impact in the soil within the AOC.

ATTACHMENT 1: Solid Waste Management and Area of Concern List

which ones
The numbers on the table do not match the SWMU or AOC numbers used in the text.

Culligan Att 1 # is correct.

If you have any questions or need additional information, please contact me at (919) 261-8186.

Sincerely,

Mineral Springs Environmental



Kirk B. Pollard, L.G.
President

C: Bob Laboube - Culligan International
Steve Pegg - Anvil Knitwear
John Coyne - Veolia Water
Larry Stanley – NC Hazardous Waste Section

123/RFA Comments/kr